

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND  
(SOUTHERN DIVISION)**

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**O.J.B./101 NORTH FREDERICK, LC**

c/o RECYCLAND, LLC,  
8101 Glenbrook Road, Ste. B,  
Bethesda, Maryland 20814

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**Plaintiff,**

\*

**v.**

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**Case No.:** \_\_\_\_\_

**TRAVELERS PROPERTY CASUALTY  
COMPANY OF AMERICA**

One Tower Square  
Hartford, Connecticut 06183

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**THE TRAVELERS INDEMNITY COMPANY  
OF ILLINOIS**

One Tower Square  
Hartford, Connecticut 06183

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**Defendants.**

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**DEFENDANTS, THE TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA’S,  
AND THE TRAVELERS INDEMNITY COMPANY OF ILLINOIS’S NOTICE OF REMOVAL**

The Defendants, The Travelers Property Casualty Company of America and The Travelers Indemnity Company of Illinois (collectively “Travelers”), by and through Craig D. Roswell, Esq. Bryant S. Green, Esq., and Niles, Barton & Wilmer, LLP, and pursuant to 28 U.S.C. §§ 1332 and 1446, hereby files this Notice of Removal from the Circuit Court of Montgomery County, Maryland, to the United States District Court for the District of Maryland, Southern Division, and in support thereof states as follows:

1. The Plaintiff initiated the present action against Travelers in the Circuit Court for Montgomery County, Maryland, Civil Action No. 461562-V, on or about January 17, 2019, alleging breach of contract and seeking damages in the amount to two million dollars (\$2,000,000.00).

2. A summons and the Complaint were subsequently served on Travelers by service on the Maryland Insurance Administration (“MIA”) on or about February 14, 2019. The MIA subsequently forwarded the writ of summons and complaint to Travelers on or about February 19, 2019.

3. Pursuant to 28 U.S.C. §1446(b)(1), this notice is being filed within 30 days of Travelers’s receipt of the Plaintiff’s initial pleadings.

4. Plaintiff, a limited liability company, maintains its principal place of business in Montgomery County, Maryland. Therefore, the Plaintiff is domiciled in Maryland.

5. Upon information and believe, none of the plaintiff’s members are domiciled in the state of Connecticut.

6. The Travelers Property Casualty Company of America is an insurance company organized under the laws of Connecticut, with its principal place of business at One Tower Square, Harford, Connecticut 06183.

7. The Travelers Indemnity Company of Illinois was an insurance company organized under the laws of Connecticut, with its principal place of business at One Tower Square, Harford, Connecticut 06183 until it underwent a name change in December of 2003 and became The Travelers Property Casualty Company of America.

8. This Court has original jurisdiction pursuant to 28 U.S.C. § 1332. There is true diversity of citizenship, and the amount in controversy exceeds \$75,000, exclusive of costs and interest.

9. A copy of the Writ of Summons directed to Travelers Property Casualty Company of America is attached hereto as Exhibit A.

10. A copy of the Writ of Summons directed to Travelers Indemnity Company of Illinois is attached hereto as Exhibit B.

11. A copy of the Complaint with Civil-Non-Domestic Case Information Report is attached hereto as Exhibit C.

12. Travelers will file and serve its responsive pleading to the Complaint as required by the Federal Rules.

13. A true and correct copy of the Notice of Filing of Removal, which has been filed contemporaneously in the Maryland Circuit Court Action, is attached as Exhibit D.

Respectfully Submitted,

/s/ Bryant S. Green, Esq. (#19752)

Craig D. Roswell, Esq. (# 09529)

Bryant S. Green, Esq. (# 19752)

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*Counsel for Defendant,*

*Travelers Property Casualty Company of America*

**CERTIFICATE OF SERVICE**

I CERTIFY that on this 15<sup>th</sup> day of March, 2019, a copy of this Notice of Removal to the United States District Court for the District of Maryland (Southern Division) was served via U.S. Mail, first-class, postage prepaid on:

C. Thomas Brown  
Silver & Brown, P.C.  
10621 Jones Street, Suite 101  
Fairfax, Virginia 22030  
*Counsel for Plaintiff*

/s/ Bryant S. Green

Bryant S. Green